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June 18, 2024

Via CM/ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *De Bianchi et al v. Petróleos de Venezuela, S.A.*, Case No. 1:23-cv-10092-LJL: Defendant's Request for Adjournment of Initial Pretrial Conference

Dear Judge Liman,

We represent Defendant, Petróleos de Venezuela, S.A. We write pursuant to Rule 1 (D) of your Honor's Individual Practices to respectfully request a four-week adjournment of the initial pretrial conference. The initial pretrial conference is currently scheduled for June 26, 2024 at 2:00 p.m.; accordingly, Defendant requests an adjournment to July 24, 2024.

Relatedly, Defendant respectfully requests a four-week extension of time to file the proposed Case Management Plan and Scheduling Order that is due before the initial pretrial conference. The deadline for the parties to file the proposed Case Management Plan and Scheduling Order is June 19, 2024; accordingly, Defendant respectfully requests an extension through July 17, 2024.

This is Defendant's first request for an adjournment or extension of time, and Plaintiffs consent to Defendant's requests. Defendant makes these requests because the parties are discussing a stipulation to resolve the claims in Plaintiffs' Complaint.

Sincerely,

/s/ Dora Georgescu
Dora Georgescu

Cc: All counsel